REMARKS

Reconsideration and allowance of the subject patent application are respectfully requested.

An Information Disclosure Statement is filed concurrently herewith.

Claims 9-12 were objected to because these claims are alleged to be "substantial duplicates" of claims 1-4. First, claims 1 and 9 have been amended and thus reconsideration of this objection is appropriate. Second, claim 1 contains certain "means-plus-function" elements which are not present in claim 9. Consequently, claims 1 and 9 are not "substantial duplicates" and withdrawal of this object is respectfully requested.

In numbered paragraph 9 of the office action, the latter portion of prior claim 1 is alleged to be "optional". Applicant does not agree with this characterization, but has nonetheless made changes to the independent claims.

First, the replacement of hyperlinks is now defined as a separate element of the independent claims. Consequently, there can be no question that the replacing of hyperlinks is "optional".

Second, the independent claims have been amended to specify the action taken when the object is determined to be unacceptable, in particular that remedial action is performed. Thus, this amendment provides definitions of the action taken in respect of each of the two possible alternatives for an individual document, namely that the content is acceptable or unacceptable.

Claims 1, 2, 4-6, 8-10 and 12 were rejected under 35 U.S.C. Section 103(a) as allegedly being "obvious" over Pham et al. (U.S. Patent Publication No. 2003/0097591) in view of Keorkunian et al. (U.S. Patent Publication No. 2004/0073631). This rejection is respectfully traversed at least insofar as it relates to the claims as now amended.

Independent claims 1, 5 and 9 will be considered. The discussion below makes reference to claim 5 for the sake of convenience, but equivalent comments apply to the corresponding apparatus features of claims 1 and 9.

Pham et al. relates to an anti-virus system for providing protection from viruses during web browsing. The anti-virus system employs a web crawler which follows links on web pages to crawl the internet. After identifying and following a link, the web crawler examines the content of the web page to detect viruses. The data is used when users browse the internet.

When a user requests a link, reference is made to the database. In the event that the database identifies the content as having a virus, access to the content is prevented or canceled.

Pham et al. at least fails to disclose or suggest the features of steps c) and e) in claim 5. In particular, Pham et al. does not disclose doing anything at all when an object is determined to be acceptable. To the contrary, the web crawler simply proceeds on its crawl through the web.

The office action contends that Keorkunian et al. supplies the teachings missing from Pham et al.

Keorkuninan et al. relates to a system for allowing anonymous viewing of premium content such as "adult" content and, in particular, without a charge for the content appearing on a viewer's credit card statement. To achieve this, viewing of the premium content is performed through an intermediate server or portal. The portal caches a copy of the premium content. The user then obtains the content from the portal without physically visiting the content provider, with the result that the user is anonymous to the content provider. Similarly, the provider of the portal charges the user without the portal tracking information about the content that has been accessed.

When the content cached on the portal contains a link to further content of the content provider, the portal replaces the link with a modified link "for accessing the further content through the server [i.e., portal]" which presumably means caching a copy of the further content.

Even if Keorkunian et al. is viewed as disclosing the retrieval of an external object (i.e., the further content) and storing that content on a trusted server (i.e., the server), Keorkunian et al. does not disclose that this action is taken responsive to a hyperlink being to an object external to the document which object is taken by the content scanner to be acceptable as required by step c) of claim 5. Therefore, Keokuninan does not disclose the action defined in step c) being performed responsive to an object being determined to be acceptable and the action defined in step d) being performed responsive to the object being determined to be unacceptable.

In view of the above comments, the independent claims are clearly not made obvious by Pham et al. and Keorkunian et al. for at least two reasons.

First, there is no reason to combine the teachings of the two documents together because their teachings are independent and for unrelated purposes. Pham et al. has the purpose of providing protection from viruses during web browsing. Keorkunian et al. has the purpose of

allowing the user to view premium content without identification of the user to the content provider. The advantages provided by the teachings of Pham et al. and Keorkunian et al. are therefore independent. Consequently, one of ordinary skill has no motivation to combine the teachings of Pham et al. and Keorkunian et al. The office action maintains that would have been obvious to modify Pham et al. in view of Keorkunian et al. "because modifying the document by replacing the link to the external object by one to a copy of the object stored on a trusted server would enable anonymously delivering content to the users and would further protect against viruses by having the user request redirected to trusted servers." This argument goes no further than alleging that the references are capable of being combined. However, within the meaning of Section 103, this capability is insufficient to make the resulting combination obvious unless the prior art also teaches the desirability of the combination. To the contrary, there is no teaching in Pham et al. and Keorkunian et al. which makes the combination desirable because the purposes behind the respective systems are entirely unrelated.

Second, even assuming for the sake of argument (and without admitting that it would have been obvious) one were to somehow and for some reason combine the teachings of Pham et al. and Keorkunian et al., the combination would not result in all the limitations of claim 5 because Keorkunian et al. only discloses retrieving and storing all external objects. Thus, Keorkunian et al. does not remedy the deficiencies of Pham et al. with respect to performing step c) of claim 5 responsive to objects being determined to be acceptable and other action being defined responsive to the object being determined to be unacceptable. Consequently, the proposed combination of Pham et al. and Keorkunian et al. cannot result in all the limitations of claim 5.

Claims 2, 4, 6, 8, 10 and 12 are dependent on the independent claims and are therefore patentably distinguished from the applied references at least because of this dependency.

Claims 3, 7 and 11 were rejected under 35 U.S.C. Section 103(a) as allegedly being "obvious" over the proposed Pham et al.-Keokunian et al. combination, in further view of Lambert et al. (U.S. Patent No. 6,629,138). Lambert et al. is applied in connection with certain features of dependent claims 3, 7 and 11 and does not remedy the deficiencies of Pham et al. and Keorkunian et al. with respect to the independent claims. Consequently, claims 3, 7 and 11 are believed to patentably distinguish over the applied references.

SHIPP, A.
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The pending claims are believed to be allowable and favorable office action is respectfully requested.

Respectfully submitted,

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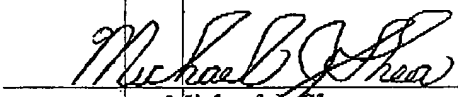
By: 

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